

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,)	<u>I N D I C T M E N T</u>
)	
Plaintiff,)	
)	CASE. NO.
v.)	
)	
ANTHONY L. JERDINE,)	
JOSEPH JONES,)	JUDGE
ALPHA PROSPERITY PROJECT, INC.,)	
ALPHA HOLDINGS GROUP, INC.,)	
ACADEMY CONSTRUCTION,)	
INTELLI, LLC,)	
TERRY SMITH,)	Title 18, Sections 371, 1344, 1957 and 2,
ROBERTO BAEZ,)	United States Code
WILLIAM J. WERNER,)	
MARILYN MANNARINO,)	
DIANA COOMER, and)	
EPHRIAN CHESTNUT,)	
)	
Defendants.)	
)	

Count 1- Conspiracy

The Grand Jury charges:

1. From in or about August 2007, through in or about December 2007, in the Northern District of Ohio, Eastern Division, and elsewhere, the defendants, ANTHONY

L. JERDINE, JOSEPH JONES, ALPHA PROSPERITY PROJECT, INC., ALPHA HOLDINGS GROUP, INC., ACADEMY CONSTRUCTION, INTELLI, LLC, TERRY SMITH, ROBERTO BAEZ, WILLIAM J. WERNER, MARILYN MANNARINO, DIANA COOMER, and EPHRIAN CHESTNUT, together and with others known and unknown to the Grand Jury, did unlawfully, willfully and knowingly combine, conspire, confederate and agree with one another to commit certain offenses against the United States, that is, violations of Title 18, United States Code, Sections 1344 (Bank Fraud) and 1957 (Money Laundering).

Introduction

2. Washington Mutual Bank (“WAMU”) was a “financial institution” with its accounts insured by the Federal Deposit Insurance Corporation as all times relevant to this indictment.

3. Defendant ANTHONY L. JERDINE (“JERDINE”) acted as the “straw buyer” (an individual who purchases a property with no intent of ever making the property his primary residence) of the property located at 7261 Hillbrook Lane, South Russell, Ohio, and, then, resold the property the same day to defendant TERRY SMITH.

4. Defendant TERRY SMITH (“SMITH”) acted as the second “straw buyer” of the property located at 7261 Hillbrook Lane, South Russell, Ohio.

5. Defendant JOSEPH JONES (“JONES”) purchased and sold real estate throughout the Northern District of Ohio and established and controlled the defendant

corporations and businesses, ALPHA PROSPERITY PROJECT, INC., ALPHA HOLDINGS GROUP, INC., ACADEMY CONSTRUCTION and INTELLI, LLC to facilitate and hide his fraudulent activities and receipt of money.

6. Defendant ROBERTO BAEZ (“BAEZ”) served as the trustee of “7261 Hillbrook Lane South Residential Trust” (“Hillbrook Trust”) and illegally distributed the over \$1.5 million fraudulently obtained from WAMU to JERDINE, JONES, ALPHA PROSPERITY PROJECT, INC., ALPHA HOLDINGS GROUP, INC., ACADEMY CONSTRUCTION and INTELLI, LLC.

7. Defendant WILLIAM J. WERNER, d.b.a. The Werner Group (“Werner”), a licensed appraiser through the State of Ohio, appraised the property at 7261 Hillbrook Lane, South Russell, Ohio at the deliberately inflated value of \$2 million at the request of defendant JERDINE.

8. Defendant MARILYN MANNARINO, a licensed title agent through the State of Ohio, operated Professional Settlement Services, LLC (“PSS”), f.k.a. Tower City Title. MANNARINO and PSS served as the title agent on the property located at 7261 Hillbrook Lane, South Russell, Ohio. As the title agent, MANNARINO and PSS had a fiduciary responsibility to WAMU to prepare the settlement statement, issue the title commitment and policy, collect SMITH’s down payment money at closing, properly distribute the mortgage proceeds from closing and insure that the relevant paperwork,

namely the U.S. Department of Housing & Urban Development Settlement Statement ("HUD-1"), was properly completed for the real estate closing.

9. Defendant DIANA COOMER ("COOMER"), a licensed mortgage broker through the State of Ohio employed by Service Plus Mortgage, Ltd., served as the mortgage broker for the second purchase of the property located at 7261 Hillbrook Lane, South Russell, Ohio by SMITH. As the mortgage broker, COOMER had a fiduciary and contractual duty to WAMU to accurately prepare and process SMITH's mortgage application and associated documents for the purchase of the property.

10. Defendant EPHRIAN CHESTNUT ("CHESTNUT"), as CEO and President of Tax Consultants, completed a fraudulent Verification of Employment ("VOE") on behalf of SMITH falsely stating that SMITH had been a client for six years and was self-employed as the owner of BSM Financial, Inc.

Objects of Conspiracy

11. The objects of the conspiracy were as follows:

- a. To engage in a fraudulent real estate transaction involving 7261 Hillbrook Lane, South Russell, Ohio, in the Northern District of Ohio, whereby false and fraudulent representations were made on a mortgage loan application and submitted with a fraudulent appraisal report to a federally-insured financial institution in order to secure financing for the purchase of the property at an amount in excess of

\$1.5 million, which was significantly higher than the actual value of the property; and

- b. To retain these fraudulently obtained funds in excess of the actual market value of the property generated through the fraudulent real estate transaction and to launder the funds through the distribution of the funds to the defendants and their bank accounts.

Manner and Means

12. The manner and means by which the objectives of the unlawful conspiracy were accomplished consisted, among other things, of the following actions by the defendants and others:

- a. On or about July 29, 2007, defendant JERDINE entered into a Land Trust Agreement with Robert and Joni M., the owners of 7261 Hillbrook Lane, South Russell, Ohio, and established the “7261 Hillbrook Lane South Residential Land Trust” (“Hillbrook Trust”) with himself appointed as “Trustee”, and Robert and Joni M., as the “Grantors”;
- b. The Land Trust Agreement and the Hillbrook Trust gave defendant JERDINE the “rights and authority to execute sale and purchase agreements...for the purposes of obtaining a mortgage loan in favor of the Trust” concerning the property at 7261 Hillbrook Lane, South

Russell, Ohio, and conveyed the title to the property to JERDINE and the Hillbrook Trust;

- c. On August 31, 2007, defendant JERDINE, on behalf of the Hillbrook Trust, entered into a Purchase Agreement with Robert and Joni M. to purchase 7261 Hillbrook Lane, South Russell, Ohio for \$710,000, and executed a Warranty Deed to JERDINE as trustee of the Hillbrook Trust;
- d. However, on or about July 29, 2007, defendant JERDINE, as trustee of the Hillbrook Trust, had already entered into a second Purchase Agreement with defendant SMITH for SMITH to purchase the property located at 7261 Hillbrook Lane, South Russell, Ohio for \$2 million, which was significantly higher than the actual value of the property;
- e. The defendants caused a fraudulent loan application to be submitted to WAMU by defendant SMITH falsifying his employment, his income, his monthly rent, his assets, his intent to occupy the property and concealing the source of SMITH's down-payment funds in order to obtain financing to purchase the property located at 7261 Hillbrook Lane, South Russell, Ohio;

- f. The defendants obtained a fraudulent appraisal report prepared by defendant WERNER, which falsely valued the property at \$2 million in order to secure the mortgage from WAMU at that amount, which was significantly higher than the actual value of the property;
- g. The defendants also used the services of defendant COOMER as the mortgage broker and defendant MANNARINO as the title agent in order to aid and assist them in their fraudulent real estate transaction;
- h. The defendants used various business names in order to disguise the true nature of the real estate transaction, to conceal the identities of the true recipients of the funds generated by the fraudulent real estate transactions, and to launder the funds produced by the transactions. These business names included, but are not limited to, the following:
 - 1. Alpha Prosperity Project, Inc.;
 - 2. Alpha Holdings Group, Inc.;
 - 3. Academy Construction; and,
 - 4. Intelli, LLC;
- i. Defendant MANNARINO and PSS received two wire transfers from WAMU, one in the amount of \$1,532,622.39 and one in the amount of \$100,000.00, related to the purchase of 7261 Hillbrook Lane and,

then, wired \$1,933,886.49 into the “7261 Hillbrook Lane South Residential Trust” Huntington Bank account; and,

- j. Defendant BAEZ, as the signatory on the Hillbrook Trust Huntington Bank Account distributed approximately \$2 million dollars with approximately twenty-one wire transfers and checks, including funds being distributed to defendants JERDINE, JONES, SMITH, ALPHA PROSPERITY PROJECT, INC., ALPHA HOLDINGS GROUP, INC., ACADEMY CONSTRUCTION and INTELLI, LLC.

Overt Acts

13. In furtherance of the conspiracy and to effect its objects, the following overt acts, among others, were committed in the Northern District of Ohio, Eastern Division, and elsewhere:

Overt Act A

On or about July 29, 2007, defendant JERDINE entered into a Land Trust Agreement with Robert and Joni M., the owners of 7261 Hillbrook Lane, South Russell, Ohio, which was signed by defendant JONES as a “witness”, and established the “7261 Hillbrook Lane South Residential Land Trust”.

Overt Act B

In or about July, 2007, defendant WERNER fraudulently appraised the property at 7261 Hillbrook Lane, South Russell, Ohio for \$2 million.

Overt Act C

On or about August 31, 2007, defendant JERDINE, on behalf of the Hillbrook Trust, entered into a Purchase Agreement with Robert and Joni M. to purchase 7261 Hillbrook Lane, South Russell, Ohio for \$710,000, and executed a Warranty Deed to JERDINE as trustee of the Hillbrook Trust.

Overt Act D

On or about July 29, 2007, defendant SMITH entered into a second Purchase Agreement with defendant JERDINE, as trustee of the Hillbrook Trust, to purchase the property located at 7261 Hillbrook Lane, South Russell, Ohio for \$2 million.

Overt Act E

On or about August 31, 2007, as the trustee of the Hillbrook Trust, defendant JERDINE signed the HUD-1 evidencing the purchase of 7261 Hillbrook Lane, South Russell, Ohio by the Hillbrook Trust from Robert and Joni M. for \$710,000.

Overt Act F

On or about August 31, 2007, as the trustee of the Hillbrook Trust, defendant JERDINE signed the HUD-1 stating that, after his review, the HUD-1 represented a true and accurate statement of all of the receipts and disbursements, including the purchase of

7261 Hillbrook Lane, South Russell, Ohio by the Hillbrook Trust from Robert and Joni M. for \$710,000.

Overt Act G

On or about August 31, 2007, defendant SMITH signed a Uniform Residential Loan Application, completed with the assistance of defendant COOMER through Service Plus Mortgage, Ltd., which application fraudulently falsified SMITH's employment, his income, his monthly rent, his assets, his intent to occupy the property as his primary residence and concealing the source of the down-payment funds, and submitted it to WAMU in order to secure the over \$1.5 million mortgage loan to complete the purchase of the property for \$2 million.

Overt Act H

On or about August 31, 2007, defendant SMITH signed a second Uniform Residential Loan Application, completed with the assistance of defendant COOMER through Service Plus Mortgage, Ltd., which application fraudulently falsifying SMITH's employment, his income, his monthly rent, his assets, his intent to occupy the property as his primary residence and concealing the source of the down-payment funds, and submitted it to WAMU in order to secure a 2nd mortgage in the amount of \$100,000.

Overt Act I

On the same day, August 31, 2007, defendant SMITH and defendant JERDINE, as the trustee of the Hillbrook Trust, signed the HUD-1 stating that, after their review, the HUD-1 represented a true and accurate statement of all of the receipts and disbursements, including the purchase of 7261 Hillbrook Lane, South Russell, Ohio by defendant SMITH for \$2 million, that SMITH provided a \$382,268.27 down payment and that \$1,933,856.49 was disbursed to defendant JERDINE and the Hillbrook Trust.

Overt Act J

On or about August 31, 2007, defendant MANNARINO and PSS received two wire transfers from WAMU, one in the amount of \$1,532,622.39 and one in the amount of \$100,000.00, related to the purchase of 7261 Hillbrook Lane.

Overt Act K

On or about September 4, 2007, defendant MANNARINO and PSS received a cashier's check drawn on defendant ACADEMY CONSTRUCTION's Huntington Bank account number xxxxxxxx3336 (formerly Sky Bank account number xxxxxx0686) in the amount of \$382,268.27, the same amount of defendant SMITH's purported down payment, with the remitter listed as defendant SMITH.

Overt Act L

On or about August 30, 2007, defendant BAEZ opened a Huntington Bank account number xxxxxxxx6075 (formerly Sky Bank account number xxxxxxxx8830) in the name of “7261 Hillbrook Lane South Residential Trust” and deposited \$100.

Overt Act M

On or about September 4, 2007, defendant MANNARINO and PSS wired \$1,933,886.49 into 7261 Hillbrook Lane South Residential Trust’s Huntington Bank account number xxxxxxxx6075 (formerly Sky Bank account number xxxxxxxx8830) .

Overt Act N

On or about September 4, 2007, defendant MANNARINO and PSS received two checks: check number 6159092 in the amount of \$351,214.18, and check number 6159093 in the amount of \$351,214.18 for a total of \$702,428.36, which represented the amount defendant JERDINE paid Robert and Joni M. for 7261 Hillbrook Lane, South Russell. These two checks were drawn on defendant ALPHA PROSPERITY PROJECT INC.’s Huntington Bank account number xxxxxxxx0318 (formerly Sky Bank account number xxxxxxxx9298), which account was controlled by defendant JONES.

Overt Act O

On or about September 4 and 5, 2007, defendant BAEZ and defendant JERDINE caused check number 678922 in the amount of \$420,000, and check number 678925 in the amount of \$180,000 to be drawn on 7261 Hillbrook Lane South Residential Trust’s

Huntington Bank account number xxxxxxxx6075, and both were payable to defendant ALPHA PROSPERITY, a business controlled by defendant JONES. Both checks were deposited into ALPHA PROSPERITY PROJECT INC.'s Huntington Bank account number xxxxxxxx0318, on or about September 4 and 7, 2007, respectively.

Overt Act P

On or about September 4, 2007, defendant BAEZ and defendant JERDINE caused check number 678928 to be drawn on 7261 Hillbrook Lane South Residential Trust's Huntington Bank account number xxxxxxxx6075, in the amount of \$311,000 and payable to defendant INTELLI, LLC, a business controlled by defendant JONES, which was deposited on or about September 4, 2007 into INTELLI, LLC's Huntington Bank account number xxxxxxxx9390.

Overt Act Q

On or about September 4, 2007, defendant BAEZ caused check number 678938 to be drawn on 7261 Hillbrook Lane South Residential Trust's Huntington Bank account number xxxxxxxx6075, in the amount of \$288,999 and payable to defendant ALPHA HOLDINGS, INC., a business controlled by defendant JONES, which was deposited on or about September 4, 2007 into ALPHA HOLDINGS GROUP, INC.'s Huntington Bank account number xxxxxxxx6617.

All in violation of Title 18, United States Code, Section 371.

Count 2 - Bank Fraud

The Grand Jury further charges:

1. The allegations of paragraphs 2 through 13 of Count 1 of this indictment are realleged and incorporated by reference herein.

2. From in or about August 2007, through in or about December 2007, in the Northern District of Ohio, Eastern Division, and elsewhere, the defendants, ANTHONY L. JERDINE, JOSEPH JONES, ALPHA PROSPERITY PROJECT, INC., ALPHA HOLDINGS GROUP, INC., ACADEMY CONSTRUCTION, INTELLI, LLC, TERRY SMITH, ROBERTO BAEZ, WILLIAM J. WERNER, MARILYN MANNARINO, DIANA COOMER, and EPHRIAN CHESTNUT, and others acting in concert with them and at their direction, knowingly executed and attempted to execute a scheme and artifice to defraud Washington Mutual Bank ("WAMU"), a FDIC insured financial institution, and to obtain moneys, funds, credits, assets, securities, and other property owned by and under the custody and control of WAMU, by means of false and fraudulent pretenses, representations, and promises, in connection with a mortgage loan in the amount of approximately \$1.5 million, and a second mortgage loan in the amount of approximately \$100,000 in the name of defendant TERRY SMITH on property located at 7162 Hillbrook Lane, South Russell, Ohio.

All in violation of Title 18, United States Code, Sections 1344 and 2.

Counts 3 through 15 - Money Laundering

Count 3

The Grand Jury further charges:

1. The allegations of paragraphs 2 through 13 of Count 1, and Count 2 of the indictment are realleged and incorporated by reference herein.
2. On or about September 4, 2007, in the Northern District of Ohio, Eastern Division, the defendants ANTHONY L. JERDINE, JOSEPH JONES and ROBERTO BAEZ, did knowingly engage and attempt to engage in a monetary transaction affecting interstate commerce, in criminally derived property of a value greater than \$10,000.00, to wit: defendant BAEZ and defendant JERDINE caused check number 678922 in the amount of \$420,000, and check number 678925 in the amount of \$180,000 to be drawn on 7261 Hillbrook Lane South Residential Trust's account number xxxxxxxx6075 maintained at Huntington Bank in Cleveland, Ohio, and both checks were payable to defendant ALPHA PROSPERITY, a business controlled by defendant JONES. Both checks were deposited into ALPHA PROSPERITY PROJECT INC.'s Huntington Bank account number xxxxxxxx0318, on or about September 4 and 7, 2007, respectively, such property having been derived from specified unlawful activity, that is, bank fraud in violation of Title 18, United States Code, Section 1344.

All in violation of Title 18, United States Code, Sections 1957 and 2.

Count 4

The Grand Jury further charges:

1. The allegations of paragraphs 2 through 13 of Count 1, and Count 2 of the indictment are realleged and incorporated by reference herein.

2. On or about September 4, 2007, in the Northern District of Ohio, Eastern Division, the defendants ANTHONY L. JERDINE, JOSEPH JONES and ROBERTO BAEZ, did knowingly engage and attempt to engage in a monetary transaction affecting interstate commerce, in criminally derived property of a value greater than \$10,000.00, to wit: defendant BAEZ and defendant JERDINE caused check number 678928 to be drawn on 7261 Hillbrook Lane South Residential Trust's account number xxxxxxxx6075 maintained at Huntington Bank, Cleveland, Ohio in the amount of \$311,000 and payable to defendant INTELLI, LLC, a business controlled by defendant JONES, which was deposited on or about September 4, 2007 into INTELLI, LLC's Huntington Bank account number xxxxxxxx9390, such property having been derived from specified unlawful activity, that is, bank fraud in violation of Title 18, United States Code, Section 1344.

All in violation of Title 18, United States Code, Sections 1957 and 2.

Count 5

The Grand Jury further charges:

1. The allegations of paragraphs 2 through 13 of Count 1, and Count 2 of the indictment are realleged and incorporated by reference herein.
2. On or about September 4, 2007, in the Northern District of Ohio, Eastern Division, the defendants ANTHONY L. JERDINE, JOSEPH JONES and ROBERTO BAEZ, did knowingly engage and attempt to engage in a monetary transaction affecting interstate commerce, in criminally derived property of a value greater than \$10,000.00, to wit: defendant BAEZ and defendant JERDINE caused check number 678938 to be drawn on 7261 Hillbrook Lane South Residential Trust's account number xxxxxxxx6075 maintained at Huntington Bank, Cleveland, Ohio in the amount of \$288,999 and payable to defendant ALPHA HOLDINGS, INC., a business controlled by defendant JONES, which was deposited on or about September 4, 2007 into ALPHA HOLDINGS GROUP, INC.'s Huntington Bank account number xxxxxxxx6617, such property having been derived from specified unlawful activity, that is, bank fraud in violation of Title 18, United States Code, Section 1344.

All in violation of Title 18, United States Code, Sections 1957 and 2.

Count 6

The Grand Jury further charges:

1. The allegations of paragraphs 2 through 13 of Count 1 and Count 2 of the indictment are realleged and incorporated by reference herein.

2. On or about September 5, 2007, in the Northern District of Ohio, Eastern Division, the defendants ANTHONY L. JERDINE and ROBERTO BAEZ did knowingly engage and attempt to engage in a monetary transaction affecting interstate commerce, in criminally derived property of a value greater than \$10,000.00, to wit: the defendants caused the deposit of check number 6159106 drawn on 7261 Hillbrook Lane South Residential Trust's account number xxxxxxxx6075 maintained at Huntington Bank, Cleveland, Ohio made payable to Hilarie M. in the amount of \$50,000.00 into account number xxxxxxxx1795 in the name of ANTHONY L. JERDINE, at Fifth Third Bank, such property having been derived from specified unlawful activity, that is, bank fraud in violation of Title 18, United States Code, Section 1344.

All in violation of Title 18, United States Code, Sections 1957 and 2.

Count 7

The Grand Jury further charges:

1. The allegations of paragraphs 2 through 13 of Count 1 and Count 2 of the indictment are realleged and incorporated by reference herein.

2. On or about September 5, 2007, in the Northern District of Ohio, Eastern Division, the defendants ANTHONY L. JERDINE and ROBERTO BAEZ did knowingly engage and attempt to engage in a monetary transaction affecting interstate commerce, in criminally derived property of a value greater than \$10,000.00, to wit: the defendants caused the deposit of a check number 6159108 drawn on 7261 Hillbrook Lane South Residential Trust's account number xxxxxxxx6075 maintained at Huntington Bank, Cleveland, Ohio made payable to defendant JERDINE in the amount of \$23,000.00 into account number xxxxxxxx1795 in the name of ANTHONY L. JERDINE, at Fifth Third Bank, such property having been derived from specified unlawful activity, that is, bank fraud in violation of Title 18, United States Code, Section 1344.

All in violation of Title 18, United States Code, Sections 1957 and 2.

Count 8

The Grand Jury further charges:

1. The allegations of paragraphs 2 through 13 of Count 1 and Count 2 of the indictment are realleged and incorporated by reference herein.

2. On or about September 10, 2007, in the Northern District of Ohio, Eastern Division, the defendant ANTHONY L. JERDINE did knowingly engage and attempt to engage in a monetary transaction affecting interstate commerce, in criminally derived property of a value greater than \$10,000.00, to wit: the defendant caused the deposit of a check number 1 drawn on account number xxxxxxxx1795 in the name of ANTHONY L. JERDINE, maintained at Fifth Third Bank, Cleveland, Ohio made payable to Professional Settlement Services in the amount of \$20,000.00, such property having been derived from specified unlawful activity, that is, bank fraud in violation of Title 18, United States Code, Section 1344.

All in violation of Title 18, United States Code, Sections 1957 and 2.

Count 9

The Grand Jury further charges:

1. The allegations of paragraphs 2 through 13 of Count 1 and Count 2 of the indictment are realleged and incorporated by reference herein.

2. On or about September 12, 2007, in the Northern District of Ohio, Eastern Division, the defendant ANTHONY L. JERDINE did knowingly engage and attempt to

engage in a monetary transaction affecting interstate commerce, in criminally derived property of a value greater than \$10,000.00, to wit: the defendant caused the deposit of a check number 2 drawn on account number xxxxxxxx1795 in the name of ANTHONY L. JERDINE, maintained at Fifth Third Bank, Cleveland, Ohio made payable to Land Rover in the amount of \$20,000.00, such property having been derived from specified unlawful activity, that is, bank fraud in violation of Title 18, United States Code, Section 1344.

All in violation of Title 18, United States Code, Sections 1957 and 2.

Count 10

The Grand Jury further charges:

1. The allegations of paragraphs 2 through 13 of Count 1 and Count 2 of the indictment are realleged and incorporated by reference herein.
2. On or about September 4, 2007, in the Northern District of Ohio, Eastern Division, the defendants JOSEPH JONES and ALPHA HOLDINGS GROUP, INC. did knowingly engage and attempt to engage in a monetary transaction affecting interstate commerce, in criminally derived property of a value greater than \$10,000.00, to wit: the defendants caused the transfer from account number xxxxxxxx6617 in the name of defendant ALPHA HOLDINGS GROUP, INC., maintained at Huntington Bank, Cleveland, Ohio to Ethnic Inspirations, located in Atlanta, Georgia, in the amount of \$240,001, such property having been derived from specified unlawful activity, that is, bank fraud in violation of Title 18, United States Code, Section 1344.

All in violation of Title 18, United States Code, Sections 1957 and 2.

Count 11

The Grand Jury further charges:

1. The allegations of paragraphs 2 through 13 of Count 1 and Count 2 of the indictment are realleged and incorporated by reference herein.
2. On or about September 7, 2007, in the Northern District of Ohio, Eastern Division, the defendants JOSEPH JONES and ALPHA PROSPERITY PROJECT, INC. did knowingly engage and attempt to engage in a monetary transaction affecting interstate commerce, in criminally derived property of a value greater than \$10,000.00, to wit: the defendants caused the transfer from account number xxxxxxxx0318 in the name of defendant ALPHA PROSPERITY PROJECT, INC., maintained at Huntington Bank, Cleveland, Ohio to defendant JONES in the amount of \$81,000, such property having been derived from specified unlawful activity, that is, bank fraud in violation of Title 18, United States Code, Section 1344.

All in violation of Title 18, United States Code, Sections 1957 and 2.

Count 12

The Grand Jury further charges:

1. The allegations of paragraphs 2 through 13 of Count 1 and Count 2 of the indictment are realleged and incorporated by reference herein.

2. On or about September 7, 2007, in the Northern District of Ohio, Eastern Division, the defendants JOSEPH JONES and ALPHA PROSPERITY PROJECT, INC. did knowingly engage and attempt to engage in a monetary transaction affecting interstate commerce, in criminally derived property of a value greater than \$10,000.00, to wit: the defendants caused the transfer from account number xxxxxxxx0318 in the name of defendant ALPHA PROSPERITY PROJECT, INC., maintained at Huntington Bank, Cleveland, Ohio to defendant JONES in the amount of \$50,000, such property having been derived from specified unlawful activity, that is, bank fraud in violation of Title 18, United States Code, Section 1344.

All in violation of Title 18, United States Code, Sections 1957 and 2.

Count 13

The Grand Jury further charges:

1. The allegations of paragraphs 2 through 13 of Count 1 and Count 2 of the indictment are realleged and incorporated by reference herein.

2. On or about September 21, 2007, in the Northern District of Ohio, Eastern Division, the defendants JOSEPH JONES and ACADEMY CONSTRUCTION. did knowingly engage and attempt to engage in a monetary transaction affecting interstate commerce, in criminally derived property of a value greater than \$10,000.00, to wit: the defendants caused the transfer from account number xxxxxxxx3336 in the name of defendant ACADEMY CONSTRUCTION, maintained at Huntington Bank, Cleveland,

Ohio to defendant JONES in the amount of \$20,000, such property having been derived from specified unlawful activity, that is, bank fraud in violation of Title 18, United States Code, Section 1344.

All in violation of Title 18, United States Code, Sections 1957 and 2.

Count 14

The Grand Jury further charges:

1. The allegations of paragraphs 2 through 13 of Count 1 and Count 2 of the indictment are realleged and incorporated by reference herein.

2. On or about September 25, 2007, in the Northern District of Ohio, Eastern Division, the defendants JOSEPH JONES and INTELLI, LLC did knowingly engage and attempt to engage in a monetary transaction affecting interstate commerce, in criminally derived property of a value greater than \$10,000.00, to wit: the defendants caused the wire transfer from account number xxxxxxxx9390 in the name of defendant INTELLI, LLC, maintained at Huntington Bank, Cleveland, Ohio to Ramar Consulting, in Atlanta, Georgia in the amount of \$20,000, such property having been derived from specified unlawful activity, that is, bank fraud in violation of Title 18, United States Code, Section 1344.

All in violation of Title 18, United States Code, Sections 1957 and 2.

Count 15

The Grand Jury further charges:

1. The allegations of paragraphs 2 through 13 of Count 1 and Count 2 of the indictment are realleged and incorporated by reference herein.
2. On or about September 27, 2007, in the Northern District of Ohio, Eastern Division, the defendants JOSEPH JONES and INTELLI, LLC did knowingly engage and attempt to engage in a monetary transaction affecting interstate commerce, in criminally derived property of a value greater than \$10,000.00, to wit: the defendants caused the wire transfer from account number xxxxxxxx9390 in the name of defendant INTELLI, LLC, maintained at Huntington Bank, Cleveland, Ohio to Ramar Consulting, in Atlanta, Georgia in the amount of \$20,000, such property having been derived from specified unlawful activity, that is, bank fraud in violation of Title 18, United States Code, Section 1344.

All in violation of Title 18, United States Code, Sections 1957 and 2.

Original document -- Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002

UNITED STATES v. ANTHONY JERDINE, et al.

A TRUE BILL.

FOREPERSON

WILLIAM J. EDWARDS
UNITED STATES ATTORNEY